

ESTTA Tracking number: **ESTTA624643**

Filing date: **09/02/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215038
Party	Plaintiff Marshall Amplification plc
Correspondence Address	JOHN A CLIFFORD MERCHANT & GOULD PC PO BOX 2910 MINNEAPOLIS, MN 55402 0910 UNITED STATES jclifford@merchantgould.com, aavery@merchantgould.com, dockm- pls@merchantgould.com, aries@merchantgould.com, hkliieben- stein@merchantgould.com
Submission	Motion to Extend
Filer's Name	John A. Clifford
Filer's e-mail	jclifford@merchantgould.com, aavery@merchantgould.com, dockm- pls@merchantgould.com
Signature	/John A. Clifford/
Date	09/02/2014
Attachments	2014 09 02 Motion for an Enlargement of Time and Brief in Support There- of.PDF(79400 bytes )

Marshall Amplification PLC,	)	
	)	
Opposer,	)	Opposition No. 91215038
	)	
v.	)	
	)	Serial No.: 85/904,663
Kiaico, Inc.	)	Mark: <b>MARSHAL A.R.T.</b>
	)	
Applicant.	)	
	)	

COMES NOW, the Opposer, Marshall Amplification Plc, to request an enlargement of time for it to prepare and file a reply to the counterclaim against U.S. Registration 3,940,239. Opposer requests an enlargement of time of 30 days, bringing the deadline for filing a reply to October 5, 2014.

1. The counterclaim for cancellation alleges that Opposer has abandoned its MARSHALL AMPLIFICATION trademark, specifically for “sneakers” and “belts” and additional time is required to confer with Opposer and confirm the facts applicable to the allegation.
2. Opposer is a foreign company located in the United Kingdom and additional time is required to communicate with them.
3. Opposer is represented by UK counsel and the undersigned communicates through that UK counsel, adding some delay to communications.

4. The deadline for answering the counterclaim has not yet passed and this motion is filed prior to the expiration of the period of time to file the reply.
5. Applicant, Kiaico, Inc., is not presently represented by counsel, and has been unwilling to schedule or conduct a telephonic conference with the undersigned despite several requests to do so. This decision by Applicant has slowed the overall progress of this matter and caused delay of the proceeding.
6. This request for an extension of time is not made for the purpose of mere delay of proceedings, but is submitted for the good cause described herein.

CONCLUSION

Opposer respectfully requests an order from the Trademark Trial and Appeal Board granting this request for an enlargement of time for the good cause shown above.

Respectfully submitted,

MARSHALL AMPLIFICATION PLC

By its attorneys



Date: 09/02/2014

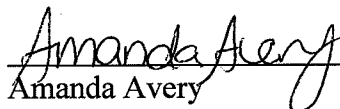
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **MOTION FOR AN ENLARGEMENT OF TIME, AND BRIEF IN SUPPORT THEREOF** was served, via first-class mail, postage prepaid on the following this 2<sup>nd</sup> day of September 2014.

Patricia Healy  
Dan Healy  
KIAICO Inc.  
445 Park Avenue, 10th. Floor  
New York, NY 10022

  
Amanda Avery